

Robert A. Mittelstaedt (State Bar No. 60359)  
ramittelstaedt@jonesday.com  
David C. Kiernan (State Bar No. 215335)  
dkiernan@jonesday.com  
Lin W. Kahn (State Bar No. 261387)  
linkahn@jonesday.com  
JONES DAY  
555 California Street, 26th Floor  
San Francisco, CA 94104  
Telephone: (415) 626-3939  
Facsimile: (415) 875-5700

Attorneys for Defendant  
Adobe Systems Inc.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

IN RE: HIGH-TECH EMPLOYEE  
ANTITRUST LITIGATION

THIS DOCUMENT RELATES TO:  
ALL ACTIONS

**Master Docket No. 11-CV-2509-LHK**

**DECLARATION OF LIN W. KAHN  
IN SUPPORT OF DEFENDANT  
ADOBE'S MOTION FOR SUMMARY  
JUDGMENT**

Date: March 20, 2104 and  
March 27, 2014  
Time: 1:30 p.m.  
Courtroom: 8, 4th Floor  
Judge: The Honorable Lucy H. Koh

1 I, Lin Wang Kahn, declare as follows:

2 1. I am an attorney with the law firm of Jones Day, counsel for Defendant Adobe  
3 Systems Inc. ("Adobe") in the above-captioned action. I am admitted to practice law before this  
4 Court. I submit this declaration in support of Defendant Adobe's Motion for Summary Judgment.  
5 As an attorney involved in the defense of this action, I have personal knowledge of the facts  
6 stated in this declaration and if called as a witness, I could and would competently testify to them.

7 **Deposition Testimony**

8 2. Attached hereto as **Exhibit A** is a true and correct copy of transcript excerpts from  
9 the February 5, 2013 deposition of William Campbell.

10 3. Attached hereto as **Exhibit B** is a true and correct copy of transcript excerpts from  
11 the March 15, 2013 deposition of Bruce Chizen.

12 4. Attached hereto as **Exhibit C** is a true and correct copy of transcript excerpts from  
13 the March 1, 2013 deposition of Digby Horner.

14 5. Attached hereto as **Exhibit D** is a true and correct copy of transcript excerpts from  
15 the March 28, 2013 deposition of George Lucas.

16 6. Attached hereto as **Exhibit E** is a true and correct copy of transcript excerpts from  
17 the November 15, 2013 deposition of Matthew Marx.

18 7. Attached hereto as **Exhibit F** is a true and correct copy of transcript excerpts from  
19 the February 28, 2013 deposition of Shantanu Narayen.

20 8. Attached hereto as **Exhibit G** is a true and correct copy of transcript excerpts from  
21 the January 29, 2013 deposition of Paul Otellini.

22 9. Attached hereto as **Exhibit H** is a true and correct copy of transcript excerpts from  
23 the March 22, 2013 deposition of Larry Page.

24 10. Attached hereto as **Exhibit I** is a true and correct copy of transcript excerpts from  
25 the February 20, 2013 deposition of Eric Schmidt.

26 11. Attached hereto as **Exhibit J** is a true and correct copy of transcript excerpts from  
27 the March 29, 2013 deposition of John Warnock.

**Interrogatories**

12. Attached hereto as **Exhibit K** is a true and correct copy of Plaintiffs' Answers and Objections to Defendants' Second Set of Interrogatories.

**Documents**

13. Attached hereto as **Exhibit L** is a true and correct copy of the document produced by Adobe with Bates number ADOBE\_000146 to ADOBE\_000160.

14. Attached hereto as **Exhibit M** is a true and correct copy of the document produced by Adobe with Bates number ADOBE\_001027 to ADOBE\_001029.

15. Attached hereto as **Exhibit N** is a true and correct copy of the document produced by Adobe with Bates number ADOBE\_001035 to ADOBE\_001037.

16. Attached hereto as **Exhibit O** is a true and correct copy of the document produced by Adobe with Bates number ADOBE\_017109 to ADOBE\_017110.

17. Attached hereto as **Exhibit P** is a true and correct copy of the document produced by Adobe with Bates number ADOBE\_047080 to ADOBE\_047083.

18. Attached hereto as **Exhibit Q** is a true and correct copy of the document produced by Adobe with Bates number ADOBE\_110308 to ADOBE\_110356.

**Deposition Exhibits**

19. Attached hereto as **Exhibit 223** is a true and correct copy of Deposition Exhibit 223, with bates number 231APPLE002143 to 231APPLE002144.

20. Attached hereto as **Exhibit 224** is a true and correct copy of Deposition Exhibit 224, with bates number ADOBE\_001096 to ADOBE\_001097.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 9th day of January 2014 in San Francisco, California.

By: /s/ Lin W. Kahn

Lin W. Kahn